

Proskauer Rose LLP 1001 Pennsylvania Avenue, NW Suite 600 South Washington, DC 20004-2533

October 10, 2023

VIA ECF

Hon. Cathy L. Waldor, U.S.M.J. U.S. District Court for the District of New Jersey Martin Luther King, Jr. Federal Building & U.S. Courthouse

> CarePoint Health Systems, et al. v. RWJ Barnabas Health Inc., Re: Case No. 22-cv-05421 (D.N.J.)

Dear Judge Waldor:

Plaintiffs ("CarePoint") and Defendant ("Barnabas") write jointly to respectfully request a 30-day-adjournment of the upcoming telephonic status conference currently scheduled before Your Honor at 2:30 PM on October 18, 2023. A proposed order is attached.

The parties recognize Your Honor's rules require adjournment requests at least 10 business days before the scheduled conference, but we believe the conference would be more productive after the parties have had more time to discuss, and hopefully resolve, various discovery disputes that have arisen. While the parties have reached resolution on some issues, the parties are still working through a number of disputes.

If the Proposed Order meets your Honor's approval, we ask that it be entered.

The Parties appreciate Your Honor's attention to this matter.

Respectfully submitted,

Counsel for Plaintiffs

/s/ Patrick M. Harrington Patrick M. Harrington, Esq. DILWORTH PAXSON LLP 457 Haddonfield Road, Suite 700 Cherry Hill, NJ 08002 856-675-1900 Pharrington@dilworthlaw.com

Counsel for RWJ Barnabas Health, Inc.

/s/ Ryan S. Blaney Ryan S. Blaney, Esq. PROSKAUER ROSE LLP 1001 Pennsylvania Ave, N.W. Washington, DC 20004 202-416-6800 rblaney@proskauer.com